

No. 45034-8-II

COURT OF APPEALS, DIVISION II  
OF THE STATE OF WASHINGTON

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CITY OF LAKEWOOD,

Respondent/Cross-Petitioner

v.

ROBERT W. WILLIS,

Petitioner/Cross-Respondent.

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REPLY BRIEF OF APPELLANT

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David Iannotti  
WSBA #37542  
Attorney for Robert Willis  
Stewart MacNichols Harmell, Inc., P.S.  
655 West Smith Street, Suite 210  
Kent, WA 98032  
Telephone: 253-859-8840  
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**A. IDENTITY OF PETITIONER**

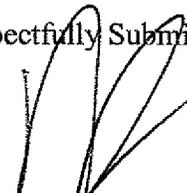
Robert Willis, by and through counsel of record, David Iannotti, submits this brief in reply to the City of Lakewood's Brief of Respondent.

**B. Reply**

There is no additional authority that Mr. Willis would like to present to the court. Mr. Willis rests on the filed brief and any argument which may occur during Oral Argument.

DATED: April 28, 2014.

Respectfully Submitted,



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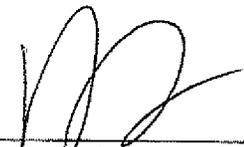
Signature  
Attorney for Petitioner  
David Iannotti – WSBA#37542  
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CERTIFICATE OF SERVICE

I certify that on the 29 day of ~~July~~ <sup>April</sup>, 2014, I caused a true and correct copy of this Motion to be served on the following in the manner indicated below:

Matthew S. Kaser  
6000 Main Street  
Lakewood, WA 98499-5027

Via DELIVERY BY ELECTRONIC MAIL TO  
[mkaser@cityoflakewood.us](mailto:mkaser@cityoflakewood.us)

By:   
David Iannotti

## KENT ASSIGNED COUNSEL

**April 28, 2014 - 3:01 PM**

### Transmittal Letter

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Case Name:

Court of Appeals Case Number: 45034-8

**Is this a Personal Restraint Petition?** Yes  No

### The document being Filed is:

Designation of Clerk's Papers Supplemental Designation of Clerk's Papers

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Brief: Reply

Statement of Additional Authorities

Cost Bill

Objection to Cost Bill

Affidavit

Letter

Copy of Verbatim Report of Proceedings - No. of Volumes: \_\_\_\_\_

Hearing Date(s): \_\_\_\_\_

Personal Restraint Petition (PRP)

Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

Petition for Review (PRV)

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### Comments:

No Comments were entered.

Sender Name: David C Iannotti - Email: [david@sbmhlaw.com](mailto:david@sbmhlaw.com)

A copy of this document has been emailed to the following addresses:

[mkaser@cityoflakewood.us](mailto:mkaser@cityoflakewood.us)